

### **REMARKS**

This amendment is submitted in response to the Examiner's Action dated May 11, 2005. Claims 1, 5-8, 12-15, and 19-21 have been amended and claims 1-21 remain pending.

### **OBJECTIONS TO THE SPECIFICATION**

At paragraph 3.1 of the present Office Action, the disclosure is objected to because the references to related co-pending Applications are now obsolete and require updating to reflect current application serial numbers and/or patent numbers. Accordingly, Applicants have reviewed the specification and provided corrections thereto. In addition, references to internal docket numbers needed to be removed. Applicants respectfully request entry of the amendments to the specification.

Furthermore, Applicants have amended the specification to correct numbering errors related to Figures 16A-16C. Applicants agree to continue to actively cooperate in identifying and correcting any errors that Applicants may become aware of in the specification.

### **CLAIMS REJECTIONS UNDER 35 U.S.C. § 112**

At paragraph 4 of the Office Action, Claims 6-7, 13-14, and 20-21 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Specifically, the Examiner asserts that the use of "said digital signature" in claim 6, which depends from claim 1 reciting "a digital signature" renders the identity of the respective "digital signature" features unclear. Applicants have amended claim 6, which now recites in part "generating an aggregate instrumentation event packet containing said aggregate instrumentation event information and a second digital signature that identifies said instrumentation event information" (emphasis added). Applicants believe this amendment adequately distinguishes the digital signature contained in the client-generated event packet (claim 6) from the digital signature computed by the instrumentation server (claim 1). Claims 13 and 20 have been similarly amended to overcome the rejection using the same analysis.

## CLAIM REJECTIONS UNDER 35 U.S.C. § 103

Claims 1-5, 8-12, and 15-19 have been rejected under 35 U.S.C. 103(a) as being unpatentable over (“WebExpress: A Client/Intercept Based System for Optimizing Web Browsing in a Wireless Environment,” Mobile Networks and Applications 3, pp. 419-431, 1998) authored by Housel et al. (hereinafter *Housel*). Applicants respectfully traverse these rejections for the following reasons.

*Housel* discloses a caching/updating technique that uses CRC’s to synchronize a single file of data such as webpages between a client and server (e.g. updating old file1 on client with new file1 on server). (See *Housel*, page 424, Fig. 4, depicting corresponding file entries identified and inherently associated by corresponding filenames abc001.htm and xyz002.gif with each version of the files having its own CRC; and page 424, first column 1 paragraph 2, explaining “[o]bjects loaded into either the *WebExpress* client or server caches persist across browser sessions ... [w]e needed a mechanism to detect when objects change and the ability to update changed objects... [t]o provide this cache coherency model, *WebExpress* associates a *digital signature* (CRC) ... with each cached object.”) *Housel* therefore uses CRC’s to determine whether or not correspondingly identified objects (e.g. client and server copies of “file1”) are identical. *Housel* achieves its data transfer efficiency goal by using the CRC’s as proxies for the underlying data objects, with the transfer and comparison of the CRC proxies providing a more efficient synchronization on a low bandwidth, high latency link.

In the foregoing manner, *Housel’s* CRC’s are individually associated with one particular data object (e.g. CRC1 is the checksum computed from and associated with a single (client or server) version of a file) and does not teach an association of multiple data objects which are generated by a single source. In contrast to *Housel’s* CRC-based data synchronization method, Applicants’ proposed invention utilizes a digital signature (claims 1, 8, and 15), such as a CRC (claims 5, 12, and 19), to associate plural instrumentation data with a single simulation model from within a batch simulation farm environment. Applicants’ Figures 16A-16C and 17A-17C and corresponding description at page 85 *et seq.*, provide detailed support for the present pending claims. Specifically, Applicants’ claims 1, 8, and 15 recite, in part, “computing a digital signature that uniquely identifies contents of said instrumentation eventlist as being associated with said simulation model.” As contended above, neither in Figure 4 on page 424, nor elsewhere does *Housel* disclose or suggest utilizing a CRC that identifies the contents of a first

data object (instrumentation eventlist) as being associated with a second and non-corresponding data object (simulation model).

Since *Housel* includes no disclosure relating to simulation models or simulation batch farms environments, and furthermore contains no disclosure or suggestion of a digital signature that associates multiple data objects, it follows that the claims 1, 8, 15, and all claims depending therefrom are patentably distinct from the disclosure of *Housel*. Applicants therefore request withdrawal of the present rejections under 35 U.S.C. 103(a) and issuance of a Notice of Allowance for all presently pending claims.

Applicants invite the Examiner to contact the undersigned Applicants' representative at 512.343.6116 if such would further or expedite the prosecution of the present Application.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'M. Baca', written over a horizontal line.

Matthew W. Baca

Reg. No. 42,277

Dillon & Yudell LLP

8911 North Capital of Texas Highway  
Suite 2110

Austin, Texas 78759

512.343.6116

ATTORNEY FOR APPLICANT(S)